

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE COALITION TO PROTEST THE  
DEMOCRATIC NATIONAL CONVENTION  
et al.,

Plaintiffs,

v.

THE CITY OF BOSTON, et al.

Defendants.

Docket No.

04 - 11608 DPW

**DECLARATION OF CAROL ROSE**

I, Carol Rose declare:

1. I make this affidavit based on personal knowledge.
2. I am the Executive Director of the American Civil Liberties Union of Massachusetts (ACLU).
3. I am familiar with the Coalition to Protest the Democratic Convention ("Coalition").
4. I am aware that the Coalition seeks a permit to march on Causeway Street in front of the Fleet Center during the Democratic National Convention ("DNC"), but the City of Boston (the "City"), through the Transportation Department, denied the Coalition's request to march on Causeway Street.
5. On July 14, 2004, I attended a meeting with representatives of the City of Boston, including Boston Police Superintendent Robert Dunford and Boston Police Superintendent James Claiborne. The purpose of the meeting was, in part, to see if a negotiated resolution of the Causeway Street parade issue was possible.
6. The City representatives informed us that they would not change their position concerning the Coalition's request for a permit to march on Causeway Street. They gave two reasons for their position.
7. First, they said the City fears that a parade on Causeway Street might result in a loss

of business for bars and restaurants on Causeway Street, and that those establishments might later sue the City.

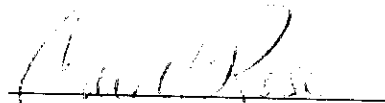
8. Second, they said the City fears that a large parade on Causeway Street could make it difficult to evacuate Causeway Street in the event of an emergency.

9. They told us that Causeway Street will be closed to motor vehicles, and that the sidewalk will be built out twenty feet to permit pedestrian traffic. They clarified that the City's policy is to allow pedestrians and spontaneous demonstrations on Causeway Street during the DNC, but to deny permits for parades on Causeway Street, no matter how large or small.

10. They assured us that the City, and not the Federal Government, has the final authority to make all decisions concerning activities on Causeway Street.

11. We also discussed the City's proposed alternative parade route. One leg of the route takes the marchers along Rip Valenti Way and into an enclosed Demonstration Zone the City is creating specially for protests during the DNC. Superintendent Dunford represented that the route along Rip Valenti Way is about twenty feet wide. He also represented that the entrance to the Demonstration Zone passes under an overhead structure, leaving six feet of vertical clearance. Finally, he showed us a sample of the material that will be wrapped on the fences enclosing the Demonstration Zone. The material is plastic "archery netting" that is nearly opaque.

Signed under the pains and penalties of perjury this 19 day of July, 2004.

  
Carol Rose